

DCP:ADR  
F. #2021R00699

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

FRANZISKA VON GREVE-DIERFELD,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN PECK, being duly sworn, deposes and states that he is a Special Agent with the United States Secret Service.

Upon information and belief, in or about and between April 2021 and September 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant FRANZISKA VON GREVE-DIERFELD, together with others, did knowingly and intentionally engage in one or more monetary transactions, in and affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000 and that was derived from specified unlawful activity, to wit: wire fraud and bank fraud, in violation of Title 18, United States Code, Sections 1343 and 1344, respectively, knowing that the property involved in such monetary transactions represented the proceeds of some form of unlawful activity.

(Title 18, United States Code, Section 1957(a))

**To Be Filed Under Seal**

**COMPLAINT AND**  
**AFFIDAVIT IN SUPPORT**  
**OF AN APPLICATION FOR**  
**AN ARREST WARRANT**

(18 U.S.C. § 1957(a))

Case No. 22-MJ-547

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the United States Secret Service ("USSS") and have been involved in the investigation of numerous cases involving financial crimes, including wire fraud, bank fraud and money laundering. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, interviews with witnesses and victims, and from reports of other law enforcement officers involved in the investigation.

2. On or about April 23, 2021, the defendant FRANZISKA VON GREVE-DIERFELD opened a business checking account at Bank-1, a financial institution the identity of which is known to your deponent, for an entity called Enbro LLC (the "Bank-1 Account"). In the account application, DIERFELD provided a phone number of 312-647-1147 (the "Subject Phone Number") and an address of 19 N Morgan St., Apt. 1310, Chicago, IL 60607 (the "Morgan Street Address"). According to public records reviewed by law enforcement, Enbro LLC was registered in Illinois and has an organization date of October 28, 2020. The business address used to register Enbro LLC was the Morgan Street Address, and DIERFELD is listed as the agent for Enbro LLC.

3. In the application to open the Bank-1 Account, the defendant FRANZISKA VON GREVE-DIERFELD described Enbro LLC as a "wholesale fabrics and furniture" business with annual gross sales of \$100,000, and listed herself as the "Owner with Control of the Entity." However, the Bank-1 Account was not used for transactions relating to

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

the sale of fabrics or furniture, and no such transactions appear in the account records. Rather, as described below, the Bank-1 Account and Enbro LLC were used by DIERFELD to facilitate the receipt of fraudulent proceeds of criminal conduct.

4. In particular, on or about April 30, 2021, the Bank-1 Account received a wire transfer of approximately \$360,000 from an attorney in Seattle, Washington, an individual whose identity is known to your deponent (the "Attorney"). On or about May 3, 2021, the Bank-1 Account received a second wire transfer of approximately \$340,000 from the Attorney. The Attorney had received instructions to send the wire transfers to the Bank-1 Account in connection with what he believed to be a legitimate transaction on behalf of a new client. However, the funds he received from the client for the transaction were actually sent to him unintentionally by a title insurance company in Sacramento, California that was the victim of a Business Email Compromise ("BEC") scheme. As part of a BEC scheme, companies and individuals involved in real estate transactions received fraudulent emails instructing them to wire transaction funds to a different bank account than had been previously identified to them. The funds were then sent to and through accounts controlled by the perpetrators and misappropriated from the victims. In this instance, the title insurance company in Sacramento, California received an email from the compromised account of a legitimate business partner directing it to a fax containing fraudulent payment instructions that listed the Attorney's account.

5. The Bank-1 Account received additional fraudulent proceeds several days later. On or about and between May 12, 2021 and May 13, 2021, the Bank-1 Account deposited two checks totaling approximately \$996,240 from a civic organization in Philadelphia, Pennsylvania, the identity of which is known to your deponent (the "Organization"). However, the checks were fraudulent and were not drafted by the Organization but instead were forged

using the signature of an Organization official whose signature regularly appeared in the Organization's newsletter. Bank-1 later returned a portion of the funds to the Organization upon determining that they had been deposited into the Bank-1 Account fraudulently.

6. The defendant FRANZISKA VON GREVE-DIERFELD remained the sole owner of the Bank-1 Account at all times, and no funds other than the fraudulent wire transfers and checks described above, and a nominal account opening deposit of \$25, were deposited into the Bank-1 Account.

7. On or about and between May 3, 2021 and May 13, 2021, the defendant FRANZISKA VON GREVE-DIERFELD sent three wire transfers from the Bank-1 Account totaling \$1,075,000 to a jewelry store located in Miami, Florida, the identity of which is known to your deponent ("Jewelry Store 1"), for the purchase of luxury watches, which were shipped to the Morgan Street Address. DIERFELD further depleted the Bank-1 Account through cash withdrawals and debit purchases at department stores in Chicago, Illinois.

8. Records obtained from the property management company of the Morgan Street Address indicate that the defendant FRANZISKA VON GREVE-DIERFELD resided at the Morgan Street Address from in or around October 2020 through November 2021. Records obtained from T-Mobile U.S., Inc. for the Subject Phone Number list the subscriber's name as Enbro LLC with an address the same as the Morgan Street Address, and an account effective date of April 19, 2021, four days before DIERFELD opened the Bank-1 Account using that number.

9. The defendant FRANZISKA VON GREVE-DIERFELD engaged in similar schemes at other financial institutions. For example, on or about September 21, 2021, DIERFELD opened a business checking account at Bank-2, a financial institution the identity of

which is known to your deponent, for an entity called Enbrousa LLC (the “Bank-2 Account”). DIERFELD listed herself as an authorized signer in the account application and provided the Subject Phone Number and a Pennsylvania address.

10. On or about September 24, 2021, the Bank-2 Account received two wires totaling approximately \$2,277,090.99 from a grocery store business in Iowa (the “Grocery Business”), the identity of which is known to your deponent, which also was the victim of a BEC scheme. As part of the scheme, the Grocery Business received instructions to send funds to the Bank-2 Account from an email address it believed was associated with its legitimate business partner. However, the instructions in fact came from an email address with a domain name that was a slightly misspelled version of the business partner’s name, and the Bank-2 Account was not the intended recipient of the funds. Bank-2 later returned a portion of the funds to the Grocery Business upon determining that they had been received by the Bank-2 Account fraudulently. No funds other than the fraudulent wire transfers, and a nominal account opening deposit of \$50, were deposited into the Bank-2 Account.

11. On or about September 27, 2021, the Bank-2 Account sent a wire transfer of approximately \$910,000 to a jewelry store located in Queens, New York whose identity is known to your deponent (“Jewelry Store 2”).

12. On or about September 27, 2021 and September 28, 2021, the Bank-2 Account was further depleted through the purchase of cashier’s checks and through a counter check in the amount of approximately \$93,700 payable to “CASH,” as depicted below:

ENERGUSH LLC  
136 STREET RD  
HOLTWOOD, PA, 17532-9649

66-112  
531 8442384

Date September 28, 2021

PAY CASH \$93,700.00  
to the order of  
NINETY-THREE THOUSAND SEVEN HUNDRED & NO/100 Dollars

BB&T

PLEASE ENTER YOUR ACCOUNT NUMBER BELOW  
\* 1090021541121  
→ USE FOR 10 DIGIT ACCOUNT NUMBER

Name \_\_\_\_\_ Signature *[Signature]*

8442384 053101121

COUNTER CHECK

13. The signature on the counter check matches the signature the defendant FRANZISKA VON GREVE-DIERFELD had previously provided on other documents related to the Bank-2 Account, as depicted below:

Please sign beside the Printed Name(s) only. If signature line does not have a Printed Name, then a signature is not required on that line.

87-221576 Franziska Greve-Dierfeld, *[Signature]* 9-27-21  
SSN/TIN/EIN Printed Name DATE

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant FRANZISKA VON GREVE-DIERFELD may be dealt with according to law. Because public filing of this document could result in a risk of flight by DIERFELD, as well as jeopardize the government's ongoing investigation, your deponent

respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

/s/ Jonathan Peck

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JONATHAN PECK  
Special Agent  
United States Secret Service

Sworn to before me by telephone this  
20th day of May, 2022

Marcia M. Henry  
THE HONORABLE MARCIA M. HENRY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK